

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

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MAIL ROOM
CC Docket No. 92-237

In the Matter of)
North American Numbering Plan)
Carrier Identification Codes (CICs))

COMMENTS OF UNITED UTILITIES, INCORPORATED
ON SECOND FURTHER NOTICE OF PROPOSED RULEMAKING
PURSUANT TO FCC 97-237

United Utilities, Inc.
5450 A Street
Anchorage, Alaska 99518
907-561-1764

COMMENTS OF UNITED UTILITIES, INC.,
December 5, 1997

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SUMMARY

Should the Commission seek to adopt through rulemaking the tentative conclusion that LECs whose end office are equipped with SPC switches to upgrade their facilities to enable them to offer equal access, United urges the Commission to adopt common-sense rules for administration of this requirement.

First, United urges that Alaska be excluded from the operation of this rule based on the unique circumstances present in the Alaska interexchange market.

Second, United urges that the Commission grant an exemption at those remote Alaska locations having fewer than 500 access lines where no bona fide request for equal access has been made by an interexchange carrier.

United believes that the inclusion of the above provision is appropriate for Alaska based on the configuration of the Alaska network. United also asserts that such rules would ensure that ratepayers are not charged for equipment and services for the provision of equal access where no demand for such service has been made by a facilities-based interexchange carrier.

1 COMMENTS

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4 United Utilities, Inc. (United), a rural Alaskan local exchange carrier (LEC) hereby responds
5 to the Commission's Second Further Notice of Proposed Rulemaking on the status of LEC
6 conversion to accept four-digit CICs and the upgrade of LEC end office switches to permit equal
7 access.

8 United's comments focus on the adoption of the Commission's tentative conclusion that
9 LECs with SPC switches that have not received a bona fide request for equal access should be
10 required to upgrade their facilities to provide equal access and to accept four-digit CICs within three
11 years of the effective date of an Order adopted in this proceeding. United believes that adoption of
12 this tentative decision without flexibility would be ill-advised in the Alaska marketplace served by
13 United.

14 United has 57 local exchange switches in 58 locations scattered over 200,000 square miles
15 in rural Alaska. Most of these switches are not accessible by road. These exchanges have, on the
16 average, approximately 80 access lines. Most of these exchanges are served by a single, facilities
17 based interexchange carrier, AT&T Alascom through the use of satellite technology. At the present
18 time, only one location served by United, Togiak-Twin Hills, is providing equal access interexchange
19 service, with alternative facilities from GCI Communications. With the exception of Togiak-Twin
20 Hills, all interexchange calls from these satellite locations are required to be physically routed, by
21 satellite, to one of three billing centers maintained by AT&T Alascom. Installing equal access
22 software, accepting four-digit CIC's (101xxxx), and converting to Feature Group D signaling will
23 not change the fact that all toll calls are routed to and transported (via satellite) by AT&T Alascom.

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1 There has been no indication that AT&T Alascom plans to offer a service in Alaska¹ to competing
2 IXC's to transport their 101xxxx dialed calls. Therefore, the expense of purchasing equal access
3 software and converting to Feature Group D signaling serves no purpose from the subscriber
4 viewpoint. In fact, in the one location where United provides equal access, AT&T Alascom is
5 unable to accept Feature Group D and continues to receive Feature Group C signaling.

6 Under these circumstances, United believes that requiring upgrades to all of United's
7 switches to permit equal access will be a wasteful expenditure of funds and only serve to increase
8 costs to the consumer.

9 United proposes for the Alaska market therefore, that should the Commission adopt the
10 tentative conclusion that switch upgrades be required for all SPC switches to permit equal access,
11 that such a conclusion also include one or both of the following exceptions:

12 First, that remote Alaskan locations with fewer than 500 access lines be excluded from
13 operation of this rule.

14 Second, Rural LECs should be permitted to wait until AT&T Alascom informs the LEC that
15 AT&T Alascom has an approved tariff to transport competing IXC's 101xxxx dialed traffic and that
16 AT&T Alascom has a bona fide customer for this service that plans to originate 101xxxx traffic in
17 rural Alaska.

25 ¹ The Commission should recognize that AT&T Alascom tariffs for services to competing
26 IXC's are generally available only in the lower 48 states, regardless of the commitments AT&T
27 Alascom has made to the Commission and the Alaska Public Utilities Commission when they
28 purchased Alascom.

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1 Respectfully submitted this 5th day of December, 1997.
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